

HARRIS

ST. LAURENT

WECHSLER

November 1, 2021

By CM/ECF

Hon. Brian M. Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Full Circle United, LLC v. Bay Tek Entm't, Inc.*, No. 1:20-cv-03395-BMC

Dear Judge Cogan:

I write to report to the Court the Special Master's decision on whether to recommend an extension of the discovery deadline in this matter. As reflected in the Amended Order No. 6, which has been filed separately [Dkt. #82], the Special Master has recommended a new deadline of January 31, 2022 for discovery, including fact discovery and expert discovery.

The Court previously stated that it would consider FCU's request for an extension of the deadline to file its motion for leave to amend after the Special Master issues her recommendation concerning an extension of the discovery deadline. FCU reiterates that request. The request stems from new evidence discovered in Bay Tek's October 5-11, 2021 productions and an October 15, 2021 interrogatory answer (in response to discovery requests served October 2020) and from a stipulation Bay Tek made to the Special Master last Friday, October 29, 2021. FCU requests that the deadline for FCU's motion for leave to amend be set for one week after the order resetting the deadline is entered.

Respectfully submitted,

L. Reid Skibell

cc: All Counsel of Record